

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

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TOBACCO LITIGATION TEAM

UNITED STATES OF AMERICA,

Plaintiff,

v.

PHILIP MORRIS, INCORPORATED,

et al.,

Defendants.

Civil Action No. 99-CV-2496(GK)

**PHILIP MORRIS INCORPORATED'S RESPONSES TO
THE UNITED STATES' FIRST SET OF INTERROGATORIES TO DEFENDANTS**

Defendant Philip Morris Incorporated ("Philip Morris") responds to the United States' First Set of Interrogatories to Defendants ("Interrogatories") as follows:

PRELIMINARY STATEMENT

Since 1996 Philip Morris has been producing documents responsive to discovery requests in United States smoking and health litigation into a document depository in Minneapolis, Minnesota, known as the "Minnesota Depository," which was established by Court Order dated June 15, 1995 in the State of Minnesota (Humphrey) v. Philip Morris Incorporated, et al., Case No. C1-94-8565 (Ramsey County, Minnesota) ("the Minnesota Litigation"). In response to document requests in that action, the scope and meaning of which were the subject of extensive negotiations with the Minnesota Attorney General and clarifications from the Minnesota Court, including a date "cut-off" limiting most responsive documents to those created on or before August 19, 1994, Philip Morris spent more than two years collecting, reviewing and producing into the Minnesota Depository over 6.8 million pages of documents at a cost to Philip Morris,

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Comprehensive Requests. For example, Comprehensive Request Nos. 80 and 83 seek documents that contain information that may be responsive to this Interrogatory.

INTERROGATORY NO. 10: List Each disease or medical condition that you have concluded is caused by smoking cigarettes, and state all facts regarding your conclusion regarding the causal relationship between cigarette smoking and Each disease or medical condition listed.

RESPONSE: Philip Morris objects to this Interrogatory on the grounds set forth in its Preliminary Statement and its General Objections, including but not limited to General Objections I and X. Philip Morris also objects to this Interrogatory on the grounds that it is overly broad and oppressive. Philip Morris further objects to the terms "concluded" and "conclusion" on the grounds that they are argumentative. Subject to and without waiving its specific and General Objections, Philip Morris states that it agrees with the overwhelming medical and scientific consensus that cigarette smoking causes lung cancer, heart disease, emphysema and other serious diseases in smokers.

INTERROGATORY NO. 11: For the years 1950 to the present, Identify Each Person employed by You with knowledge concerning Addiction to nicotine, cigarettes, or cigarette smoking, and describe all facts known by Each such person so identified.

RESPONSE: Philip Morris objects to this Interrogatory on the grounds set forth in its Preliminary Statement and its General Objections, including but not limited to, General Objections B, E, I and J. Philip Morris further objects to this Interrogatory on the grounds that it is overly broad, unduly burdensome and harassing. Philip Morris has employed literally thousands of people since 1950, many of whom have some knowledge regarding issues relating to nicotine, habituation and cigarette addiction. Subject to and without waiving its specific and General Objections, Philip Morris states that the following person has general knowledge regarding issues relating to nicotine, habituation and cigarette addiction:

Dr. Richard Carchman